



DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL COORDINATOR
450 110th Ave NE., P.O. BOX 90012
BELLEVUE, WA 98009-9012

OPTIONAL DETERMINATION OF NON-SIGNIFICANCE (DNS) NOTICE MATERIALS

The attached materials are being sent to you pursuant to the requirements for the Optional DNS Process (WAC 197-11-355). A DNS on the attached proposal is likely. This may be the only opportunity to comment on environmental impacts of the proposal. Mitigation measures from standard codes will apply. Project review may require mitigation regardless of whether an EIS is prepared. A copy of the subsequent threshold determination for this proposal may be obtained upon request.

File No.

Project Name/Address:

Planner:

Minimum Comment Period:

Materials included in this Notice:

Blue Bulletin
Checklist
Vicinity Map
Plans
Other:

OTHERS TO RECEIVE THIS DOCUMENT:

State Department of Fish and Wildlife
State Department of Ecology, Shoreline Planner N.W. Region
Army Corps of Engineers
Attorney General
Muckleshoot Indian Tribe



SEPA Environmental Checklist

The City of Bellevue uses this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions

The checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully and to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions.

You may respond with "Not Applicable" or "Does Not Apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies and reports. Please make complete and accurate answers to these questions to the best of your ability in order to avoid delays. For assistance, see [SEPA Checklist Guidance](#) on the Washington State Department of Ecology website.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The city may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Background

1. Name of proposed project, if applicable _____
2. Name of applicant _____
3. Contact person _____ Phone _____
4. Contact person address _____
5. Date this checklist was prepared _____
6. Agency requesting the checklist _____

7. Proposed timing or schedule (including phasing, if applicable)

8. Do you have any plans for future additions, expansion or further activity related to or connected with this proposal? If yes, explain.

proposal is for comp plan amendment

9. List any environmental information you know about that has been prepared or will be prepared, that is directly related to this proposal.

10. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

11. List any government approvals or permits that will be needed for your proposal, if known.

12. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

13. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and the section, township and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Environmental Elements

Earth

1. General description of the site:

- ☐ Flat
- ☐ Rolling
- ☐ Hilly
- ☐ Steep Slopes
- ☐ Mountainous
- ☐ Other _____

2. What is the steepest slope on the site (approximate percent slope)? _____

<40%

3. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

current proposal does not include a development activity

4. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

current proposal does not include a development activity

5. Describe the purpose, type, total area and approximate quantities and total affected area of any filling, excavation and grading proposed. Indicate the source of the fill.

current proposal does not include a development activity

6. Could erosion occur as a result of clearing, construction or use? If so, generally describe.

current proposal does not include a development activity

7. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? _____

current proposal does not include a development activity

8. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

current proposal does not include a development activity

Air

1. What types of emissions to the air would result from the proposal during construction, operation and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

current proposal does not include a development activity

2. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

3. Proposed measures to reduce or control emissions or other impacts to air, if any.

current proposal does not include a development activity

Water

1. Surface Water

- a. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

- b. Will the project require any work over, in or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

current proposal does not include a development activity

- c. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of the fill material.

current proposal does not include a development activity

- d. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose and approximate quantities, if known.

current proposal does not include a development activity

- e. Does the proposal lie within a 100-year floodplain? _____
If so, note the location on the site plan.

- f. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

2. Ground Water

- a. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

- b. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

current proposal does not include a development activity

3. Water Runoff (including stormwater)

- a. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

- b. Could waste materials enter ground or surface waters? If so, generally describe.

current proposal does not include a development activity

- c. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

current proposal does not include a development activity

Indicate any proposed measures to reduce or control surface, ground and runoff water, and drainage pattern impacts, if any.

Plants

1. Check the types of vegetation found on the site:

- ☐ deciduous tree: alder, maple, aspen, other _____
- ☐ evergreen tree: fir, cedar, pine, other _____
- ☐ shrubs
- ☐ grass
- ☐ pasture
- ☐ crop or grain
- ☐ orchards, vineyards or other permanent crops
- ☐ wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other _____
- ☐ water plants: water lily eelgrass, milfoil, other _____
- ☐ other types of vegetation _____

2. What kind and amount of vegetation will be removed or altered?

3. List any threatened and endangered species known to be on or near the site.

4. Proposed landscaping, use of native plants or other measures to preserve or enhance vegetation on the site, if any.

current proposal does not include a development activity

5. List all noxious weeds and invasive species known to be on or near the site.

Animals

1. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:

Birds: ☐hawk, ☐heron, ☐eagle, ☐songbirds, ☐other _____

Mammals: ☐deer, ☐bear, ☐elk, ☐beaver, ☐other _____

Fish: ☐bass, ☐salmon, ☐trout, ☐herring, ☐shellfish, ☐other _____

2. List any threatened and endangered species known to be on or near the site.

3. Is the site part of a migration route? If so, explain.

4. Proposed measures to preserve or enhance wildlife, if any.

current proposal does not include a development activity

5. List any invasive animal species known to be on or near the site.

Energy and Natural Resources

1. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

current proposal does not include a development activity

2. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

current proposal does not include a development activity

3. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

current proposal does not include a development activity

Environmental Health

1. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill or hazardous waste, that could occur as a result of this proposal? If so, describe.

- a. Describe any known or possible contamination at the site from present or past uses.

- b. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

- c. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

- d. Describe special emergency services that might be required.

- e. Proposed measures to reduce or control environmental health hazards, if any.

2. Noise

- a. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

- b. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)?
Indicate what hours noise would come from the site.

current proposal does not include a development activity

- c. Proposed measures to reduce or control noise impacts, if any.

current proposal does not include a development activity

Land and Shoreline Uses

1. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

2. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to non-farm or non-forest use?

- a. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling and harvesting? If so, how?

3. Describe any structures on the site.

4. Will any structures be demolished? If so, what?

5. What is the current zoning classification of the site? _____

6. What is the current comprehensive plan designation of the site? _____

7. If applicable, what is the current shoreline master program designation of the site?

not within shoreline jurisdiction

8. Has any part of the site been classified as a critical area by the city or county? If so, specify.

9. Approximately how many people would reside or work in the completed project? _____

10. Approximately how many people would the completed project displace? _____

11. Proposed measures to avoid or reduce displacement impacts, if any.

12. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

13. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any.

none exist nearby

Housing

1. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

2. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

3. Proposed measures to reduce or control housing impacts, if any.

Aesthetics

1. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

current proposal does not include a development

2. What views in the immediate vicinity would be altered or obstructed?

current proposal does not include a development

3. Proposed measures to reduce or control aesthetic impacts, if any

current proposal does not include a development

Light and Glare

1. What type of light or glare will the proposal produce? What time of day would it mainly occur?

current proposal does not include a development

2. Could light or glare from the finished project be a safety hazard or interfere with views?

current proposal does not include a development

3. What existing off-site sources of light or glare may affect your proposal?

current proposal does not include a development

4. Proposed measures to reduce or control light and glare impacts, if any.

current proposal does not include a development

Recreation

1. What designated and informal recreational opportunities are in the immediate vicinity?

current proposal does not include a development

2. Would the proposed project displace any existing recreational uses? If so, describe.

3. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.

current proposal does not include a developm

Historic and Cultural Preservation

1. Are there any buildings, structures or sites located on or near the site that are over 45 years old listed in or eligible for listing in national, state or local preservation registers located on or near the site? If so, specifically describe.

2. Are there any landmarks, features or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

3. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

4. Proposed measures to avoid, minimize or compensate for loss, changes to and disturbance to resources. Please include plans for the above and any permits that may be required.

current proposal does not include a development

Transportation

1. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

2. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

3. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

4. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

5. Will the project or proposal use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe.

6. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

7. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

8. Proposed measures to reduce or control transportation impacts, if any.

project level impacts will be addressed at the time of development proposal per Transportation Department Standards

Public Service

1. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

2. Proposed measures to reduce or control direct impacts on public services, if any.

Utilities

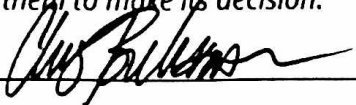
1. Check the utilities currently available at the site:

- ☐ Electricity
- ☐ natural gas
- ☐ water
- ☐ refuse service
- ☐ telephone
- ☐ sanitary sewer
- ☐ septic system
- ☐ other

2. Describe the utilities that are proposed for the project, the utility providing the service and the general construction activities on the site or in the immediate vicinity which might be needed.

Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature 

Name of signee Chris Buchanan

Position and Agency/Organization Director of Real Estate Development, DASH

Date Submitted 9/14/2020



Non-project Action SEPA Checklist

These questions pertain to land use actions that do not involve building and construction projects, but rather pertain to policy changes, such as code amendments and rezone actions.

Because the questions are very general, it may be helpful to read them in conjunction with the Environmental Checklist. When answering these questions, be aware of the extent to which the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented.

Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Indicate proposed measures to avoid or reduce such increases.

Conformance with city's utility code

2. How would the proposal be likely to affect plants, animals, fish or marine life?

Indicate proposed measures to protect or conserve plants, animals, fish or marine life.

current proposal does not include a development a

3. How would the proposal be likely to deplete energy or natural resources?

Indicate proposed measures to protect or conserve energy and natural resources.

current proposal does not include a developme

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains or prime farmlands?

none present on the site

Indicate proposed measures to protect such resources or to avoid or reduce impacts.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

not within shoreline jurisdiction

Indicate proposed measures to avoid or reduce shoreline and land use impacts.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Indicate proposed measures to reduce or respond to such demand(s).

current proposal does not include a development a

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

current proposal does not include a development a





Comprehensive Plan Amendment

Application Date _____

Application Name _____

Applicant Name _____

Applicant Address _____

Applicant Phone _____ email _____

Agent Contact _____

Agent Contact Address _____

Agent Contact Phone _____ email _____

____ This is a proposal to initiate a site-specific Comprehensive Plan Amendment proposal
(Go to [Block 1](#))

____ This is a proposal to initiate a non site-specific Comprehensive Plan Amendment proposal
(Go to [Block 2](#))

Block 1

Property address and/or 10-digit King County parcel number _____

Proposed amendment to change the map designation from existing _____
to proposed _____

Site area (in acres or square feet) _____

Subarea name _____

Last date the Comprehensive Plan designation was considered _____

Current land use district (zoning) _____

Go to [Block 3](#)

Community Council: ____ N/A ____ East Bellevue

Block 2

Proposed amendment language. This can be either conceptual or specific amendatory language. Please be as specific as possible so that your proposal can be adequately evaluated. Specific wording changes proposed, should be shown in ~~strike out~~/underline format. Submit additional pages as PDF.

Reference Element of the Comprehensive Plan (e.g., Land Use, Transportation, Housing, Capital Facilities) _____

Last date the Comprehensive Plan policy or text was considered _____

Go to [Block 3](#)

Block 3

Support for the proposed amendment. Explain the need for the amendment. Why is it being proposed? Describe how the amendment is consistent with the [Comprehensive Plan](#) Vision. Include any data, research or reasoning that supports the proposed amendment. Submit additional pages as PDF.

Go to [Block 4](#)

Block 4


Evaluating the proposed amendment. Explain how the proposed amendment is consistent with the Threshold Review Decision Criteria in LUC Section 20.301.140 (refer to Comprehensive Plan Amendment and Procedures Guide). Submit additional pages as PDF.

see attached

X I have read the Comprehensive Plan Amendment and Procedures Guide.

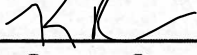
X I have contacted Community Development staff and have received an intake application letter (required before site-specific plan amendment application submittal; attach a copy of the letter to the application form when uploading documents).

Notice of Completeness: Your application is considered complete 29 days after submittal, unless otherwise notified.

Signature of applicant  Date 9/14/2020

I certify that I am the owner or owner's authorized agent. If acting as an authorized agent, I further certify that I am authorized to act as the owner's agent regarding the property at the above-referenced address for the purpose of filing applications for decisions, permits or review under the Land Use Code and other applicable Bellevue City Codes and I have full power and authority to perform on behalf of the owner all acts required to enable the city to process and review such applications.

I certify that the information on this application is true and correct and that the applicable requirements of the City of Bellevue, RCW and the State Environmental Policy Act (SEPA) will be met.

Signature  Date 9/14/20
Owner or Owner's Agent

DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

BLOCK 3

Background

The City of Bellevue has a *demonstrated need* for more affordable housing units. Renters, and in particular Seniors who rent in Bellevue have the highest rate of cost-burdened households in King County.¹ In the City's own Housing Needs Assessment dated March 2016, Bellevue identified over 9,100 households (17% of households or about 22,000 people) have low and very low incomes but only 3,095 units in Bellevue are affordable to these people.² The Housing Strategy adopted in 2017 calls for the addition of 2500 units of affordable housing in 10 years which, while admirable, does not meet the identified demand. In the time since Council adopted the Housing Strategy, Bellevue has added only 342 new units and preserved 240 existing units of affordable housing.³

DASH is an affordable housing developer founded by the Bellevue Downtown Association in 1991 to provide affordable workforce housing in Downtown Bellevue. Today, DASH owns and maintains 798 units of housing for individuals, families and seniors earning between 30% - 60% AMI. 272 units are located in the City of Bellevue's Downtown and Wilburton neighborhoods, housing nearly 500 people.

In 2018 DASH asked for a Comprehensive Plan Amendment to allow a subsequent rezone of the existing Glendale Apartments site located in the Wilburton neighborhood from Multifamily-Medium to Neighborhood Mixed Use in order to increase density and add permanent affordable housing units. During the CPA process in 2018, the geographic range of that application was extended to encompass Evergreen Court, and ultimately the CPA was diverted into the Wilburton sub-area workplan. However, since that time ***no action*** has been taken to advance the Wilburton workplan and that plan is *still pending Council authorization* to proceed.

As a result of the failure to advance the Wilburton sub-area workplan or any other meaningful action to advance the development of affordable housing since our 2018 CPA application, DASH again asks for a Comprehensive Plan Amendment to allow a subsequent rezone of the existing Evergreen Court and Glendale Apartments sites in order to increase density and add permanent affordable housing units.

This proposed amendment provides an opportunity to:

- Examine needed housing opportunities for all economic segments of the community;

¹ Washington State University, Metropolitan Center for Applied Research January 2018 study "Moving Toward Age Friendly Housing in King County"

² City of Bellevue Housing Needs Assessment March 2016, page 3.

³ Bellevue Affordable Housing Council Report March 9, 2020.

DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

- Encourage housing in an area with access to a full range of transportation options; and
- Implement Bellevue's Affordable Housing Strategy adopted by the City Council on June 5, 2017.
- Enable the development of affordable housing for seniors

The proposed amendment is consistent with the Comprehensive Plan's Visions for:

Land Use

Bellevue grows in a manner that enhances the livability of the community, while maintaining the elements that residents cherish⁴; and

Housing

Bellevue meets the housing needs of its diverse population, strengthening neighborhoods and communities⁵.

The proposal to amend the Comprehensive Plan at this site from MF-M to NMU is supported by Bellevue's Affordable Housing Strategy Actions C-1, C-4, and D-3 to increase density of affordable housing at the Glendale and Evergreen Court sites. It will provide additional, permanently affordable units for individuals, families, and seniors in the low- to moderate- income range.

Bellevue's Affordable Housing Strategy

In 2016 DASH participated in the Technical Advisory Group convened to assist in developing the City of Bellevue's Affordable Housing Strategy. Among the recommendations provided to and adopted by Council on June 5, 2017 were the following actions:

- A-1 Partner with non-profit organizations and housing agencies to fund the purchase of existing affordable multi-family housing to preserve it for the long term
- C-1 Increase development potential on suitable land owned by public agencies, faith-based, and non-profit housing entities for affordable housing.
- C-4 Inclusionary zoning: Increase zoning as an incentive to provide

⁴ City of Bellevue Comprehensive plan, pg. 4

⁵ City of Bellevue Comprehensive plan, pg. 5

DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

affordable units in new development.

- D-3 Change the city's approach to density calculation in multi-family zones to allow more flexibility in unit size and type.

Neighborhood Mixed Use (NMU) is currently the best choice to provide opportunities for increased affordable housing densities at Glendale and Evergreen Court.

Bellevue's Comprehensive Plan

This proposal to allow additional permanent affordable housing units at the Glendale and Evergreen Court sites is consistent with Comprehensive Plan Housing Element goal to provide housing opportunities for all economic segments of the community. Key findings in the Housing section of the 2015 Comprehensive Plan states:

Moderate and low income households have limited housing options in the city. Only 31 percent of Bellevue's housing stock is affordable to households with moderate incomes (earning less than 80 percent of King County median income) and only 9 percent is affordable to low income households earning less than 50 percent of King County median income.⁶

The Wilburton neighborhood has the highest percentage of rent burdened population in the city at 22%.⁷

Additional affordable housing units on the existing Glendale and Evergreen Court sites further Comprehensive Plan Policies to address Bellevue's housing needs, increase affordable housing units, and encourage housing in areas with access to a full range of transportation options as stated in these policies:

- HO-7 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.
- HO-20 Encourage a range of housing types for seniors affordable at a variety of income levels.
- HO-21 Address the entire spectrum of housing needs, including the need for housing affordable to very low, low, and moderate income households, through the city's affordable housing programs.
- HO-23 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.

⁶ City of Bellevue Comprehensive plan, pg. 79

⁷ City of Bellevue Comprehensive plan, Map HO-1, pg. 90

DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

- HO-26 Provide incentives and work in partnership with not-for-profit and for-profit developers and agencies to build permanent low- and moderate-income housing.
- HO-27 Encourage preservation, maintenance, and improvements to existing affordable housing.
- LU-3 Promote a land use pattern and an integrated multimodal transportation system.

The increased density and addition of affordable housing units at the Glendale and Evergreen Court sites would implement the final call to action in the Comprehensive Plan:

- HO-24 Develop and implement an effective strategy to ensure affordable housing opportunities are available Downtown and throughout the city at a range of affordability levels. Monitor quantity, types, and affordability of housing achieved for potential unintended consequences and to determine if the need is being met.

DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

BLOCK 4

A. This matter is appropriately addressed through the Comprehensive Plan. The Comprehensive Plan Amendment process appropriately assesses changes in the area such as

- the Affordable Housing Strategy itself
- the increasing presence of transportation alternatives serving the area including Rapid Ride “B” service
- future light rail service through the neighborhood; and
- Bellevue’s Wilburton-Grand Connection Commercial Areas study

to evaluate increased density for new permanent affordable housing units at the Glendale site.

B. The proposed amendment is in compliance with the three-year limitation rules.

C. While it is possible that the proposed amendment may be addressed by the existing Wilburton sub-area study, we have lost faith in the City’s ability to move that workplan forward in a meaningful and timely way. That work program was authorized in December 2015 and was charged with establishing an urban design vision for the Grand Connection and a new land use vision for the Wilburton commercial area.⁸ On December 7, 2017 the Wilburton CAC issued a memorandum containing draft policy statements on Affordable Housing which include the following Land Use recommendations:

Establishing policy framework for creating a bonus/incentive system similar to BelRed, including:

- Affordable housing as the initial and primary public benefit
- Using density bonuses to strongly incentivize housing affordable to people earning 80% or less of area median income
- Prioritizing the construction of affordable units within market rate housing developments over forms of alternative compliance such as in-lieu fees⁹

All of the above considerations are applicable to DASH’s existing Affordable Housing site in the Wilburton neighborhood.

In 2018, the Wilburton CAC, the Planning Commission and the City Council all agreed that the Wilburton area plan would offer the highest potential upzone for the Evergreen

⁸ Bellevue Planning Initiatives, Wilburton - Grand Connection home page

⁹ MEMO: Wilburton CAC 12/7/2017

DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

Court and Glendale properties. Unfortunately, in the time since 2018, Council has failed to authorize work to proceed on the Wilburton sub-area plan effectively sidelining our efforts to create more affordable housing units. There is currently ***no timeline*** for work to resume on the Wilburton sub-area plan. Therefore, we no longer consider this a functional option to increase density at our properties.

D. The proposed amendment can be reasonably reviewed within the resources and time frame for the annual Comprehensive Plan work program.

E. The proposed amendment addresses significantly changed conditions since the last time the Comp Plan map or text for the Glendale site was amended.

While the call to action to create a housing strategy in policy HO-24 exists in the Comprehensive Plan, the full impact of Bellevue's Affordable Housing Strategy adopted by Council on June 5, 2017 cannot have been anticipated by the Comprehensive Plan.

Nor did the current comprehensive plan anticipate the new connections to the Downtown core, workplaces and services that are now provided through the King County Metro Rapid Ride "B" line. This service runs alongside Glendale Apartments and the nearest station is 0.1 miles from the property. The future light rail station on 124th Street is approximately 0.5 miles from Glendale and will provide further connectivity to work and services throughout the region.

The passage of the Sound Transit 3 ballot measure in 2016 funding Sound Transit's east side expansion and the mandate requiring development of Affordable Housing and transit-oriented development is a changed condition. As a result of this measure, there is now a regional focus to increase housing density and provide Affordable Housing units in rapid transit walk-sheds. The Wilburton neighborhood including the Glendale and Evergreen Court properties benefit from these new rapid transit connections.

The Wilburton sub-area study is itself recognition of the change in condition of the underlying infrastructure and transportation serving the neighborhood, and Bellevue's desire to broaden connections to high growth areas. The land use changes now under consideration for this neighborhood were not anticipated in the Comprehensive Plan.

F. There are no other nearby, similarly-situated properties to include in an expansion of geographic scope. We believe this was already proved in our original Glendale CPA in 2018 and subsequent expansion to include Evergreen Court.

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G. The Comprehensive Plan contains general policies for the consideration of this type of site-specific amendment, including Housing Opportunity and Affordable Housing policies previously referenced in this application and the following:

- LU-3 Support a land use pattern and an integrated multimodal transportation system.
- LU-21 Support development of compact, livable, and walkable mixed-use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.
- ED-16 Encourage development of a range of housing opportunities to accommodate Bellevue's growing workforce
- TR-1 Integrate land use and transportation decisions to ensure that the two mutually support the Comprehensive Plan
- TR-7.1 Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that transit may support more intense development around some stations.

H. The passage of SB1377 in 2019 mandates that cities in Washington State *must allow* an increased density bonus for any affordable housing development located on property owned by a religious organization.¹⁰ While this law excludes non-profit owned property the City of Bellevue Planning Department has expressed their intent to extend this benefit to non-profit entities through their current work to advance the C-1 Strategy.

¹⁰ SB 1377 passed by Washington State Legislature in 2019 Regular Session.

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BLOCK 4b

A. The proposed rezone, consistent with a Comprehensive Plan Amendment approval would provide additional appropriate density for development of new permanently affordable housing units. It is consistent with Comprehensive Plan Policies in the Land Use, Housing, Transportation and Economic Development:

- LU-6 Encourage new residential development to achieve a substantial portion of the maximum density allowed on the net buildable acreage.
- LU-15 Provide, through land use regulation, the potential for a broad range of housing choices to meet the changing needs of the community.
- LU-21 Support development of compact, livable, and walkable mixed-use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.
- HO-7 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.
- HO-21 Address the entire spectrum of housing needs, including the need for housing affordable to very low, low, and moderate-income households, through the city's affordable housing programs.
- ED-16 Encourage development of a range of housing opportunities to accommodate Bellevue's growing workforce
- TR-7.1 Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that transit may support more intense development around some stations.

B. In adopting Bellevue's Affordable Housing Strategy in June 2017, the City Council recognized that it is critically important to provide a safe, healthy and affordable place to live for people of all income levels in order to sustain Bellevue's livability and economic vitality.¹¹

Increasing density for new affordable housing units at the Glendale site directly implements the following actions in the Affordable Housing Strategy:

- C-1 Increase development potential on suitable land owned by public agencies, faith-based, and non-profit housing entities for affordable housing.

¹¹ Bellevue Planning Initiatives, Affordable Housing Strategy home page

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- C-2 Develop affordable housing on suitable surplus lands in proximity to transit hubs.
- C-4 Inclusionary zoning: Increase zoning as an incentive to provide affordable units in new development.
- D-3 Change the city's approach to density calculation in multi-family zones to allow more flexibility in unit size and type.

C. DASH believes the proposed zoning classification is appropriate for reasonable development of the subject property. The draft policy recommendations of the Wilburton Citizen Advisory Committee recognize “affordable housing as the initial and primary public benefit.” And they recommend a change to the land use regulations in their neighborhood to “allow the use of floor-area-ratio standards rather than dwelling units per acre;” and “using density bonuses to strongly incentivize housing affordable to people earning 80% or less of the area median income.”¹² The Glendale site is within the Wilburton neighborhood, adjacent to the Wilburton study area, and is served by rapid transit, it is reasonable to request application of the same policies to this site.

D. The rezone will not be materially detrimental to uses or property in the immediate vicinity of the subject property.

E. The rezone has merit and value for the community as a whole by providing additional permanently affordable apartment units in the City of Bellevue.

¹² MEMO: Wilburton CAC 12/7/2017